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Attorneys for Defendants
AVIS RENT A CAR SYSTEM, LLC, AB CAR
RENTAL SERVICES, INC., BUDGET RENT A
CAR SYSTEM, INC.; AVIS BUDGET GROUP,
INC.; and MARIE PERAITA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

GAURAV PATHAK, SALAH DAJANI,
ZANE HUSSEINI, NAVEED JALAL,
DOLAN LONERGAN, WILLIAM
MCRAE, MEUY XAIMUANGMONH
and LORD EL-SALAAM,

Plaintiffs,

v.

AVIS RENT A CAR SYSTEM, LLC, AB
CAR RENTAL SERVICES, INC.;
BUDGET RENT A CAR SYSTEM, INC.;
AVIS BUDGET GROUP, INC.; MARIE
PERAITA, an individual; and DOES 1 to
25, inclusive,

Defendants.

Case No. C 13-01823 JSW

**STIPULATION AND ~~[PROPOSED]~~
ORDER TO AMEND ANSWER AND
NOTICE OF REMOVAL**

THIS STIPULATION is hereby entered into by and between Plaintiffs GAURAV PATHAK, SALAH DAJANI, ZANE HUSSEINI, NAVEED JALAL, DOLAN LONERGAN, WILLIAM MCRAE, MEUY XAIMUANGMONH, and LORD EL-SALAAM (collectively "Plaintiffs") and Defendants AVIS RENT A CAR SYSTEM, LLC; AB CAR RENTAL SERVICES, INC.; BUDGET RENT A CAR SYSTEM, INC.; AVIS BUDGET GROUP, INC., and MARIE PERAITA (collectively "Defendants") by through their authorized counsel, with respect to the following:

STIP. & ~~[PROPOSED]~~ ORDER TO AMEND
ANSWER AND NOTICE OF REMOVAL

Case No. C 13-01823 JSW

WHEREAS, Defendants filed an Answer to Plaintiffs' Unverified Complaint in the Superior Court of California, County of San Francisco, Case No. CGC-13-529903 on April 22, 2013 which inadvertently omitted reference to Defendant AVIS BUDGET GROUP, INC.;

WHEREAS, Defendants filed a Notice of Removal (Doc. #1) on April 24, 2013, incorporating by reference Defendants' Answer, which inadvertently omitted reference to Defendant AVIS BUDGET GROUP, INC.;

WHEREAS, the parties have discussed and agreed to the items listed below.

NOW, THEREFORE, IT IS HEREBY STIPULATED that:

1. Defendant AVIS BUDGET GROUP, INC. will be deemed to have joined in Defendants' Answer previously filed in California Superior Court and incorporated by reference in the Notice of Removal;

2. Defendant AVIS BUDGET GROUP, INC. will be deemed to have joined in the Defendants' Notice of Removal;

3. The Notice of Removal and Answer will be amended to reflect that each document was filed on behalf of Defendant AVIS BUDGET GROUP, INC.;

4. The Clerk of Court shall amend the docket to reflect this amendment; and

5. Nothing in this stipulation shall constitute a waiver of Plaintiffs' challenge to removal on the basis of subject-matter jurisdiction, currently before this Court as Plaintiffs' Motion for Remand (Doc. #11).

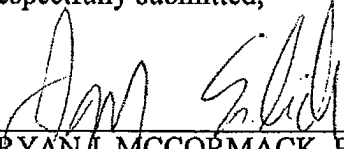
IT IS SO STIPULATED.

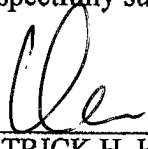
Dated: June 25, 2013

Dated: June 25, 2013

Respectfully submitted,

Respectfully submitted,

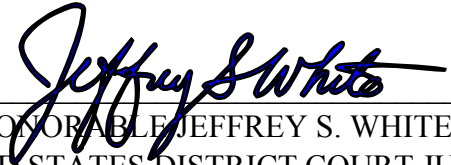

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Attorneys for Plaintiffs


PATRICK H. HICKS
KAI-CHING CHA
LITTLER MENDELSON, P.C.
Attorneys for Defendants

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: June 26, 2013.



HONORABLE JEFFREY S. WHITE
UNITED STATES DISTRICT COURT JUDGE

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